



Authorization Basis Amendment Request

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ABAR Title: Authorization Basis Maintenance – Proceed-at-Risk

ABAR #: ABAR-W375-00-00006 Revision: 1 Associated ABCN #: ABCN-W375-00-00005

Originator: Thomas R. McDonnell Date: 18 April 2000

Print Name

Description of proposed revision:

Revises the Integrated Safety Management Plan (ISMP) to allow BNFL Inc. to implement facility design changes at BNFL's risk pending revision of the Authorization Basis (AB). It is only effective during the design and construction phases prior to Start of Cold Testing. The "proceed-at-risk" approach is proposed for changes that may be made without prior RU approval, as well as for those for which prior approval by the Regulatory Official is required.

Revision 1 of this ABAR incorporates changes made by the RU to RL/REG-97-13, which were transmitted to BNFL Inc. as an enclosure to a letter from D. Clark Gibbs to M. J. Bullock, 00-RU-0285, "RL/REG-97-13, 'CONTRACTOR-INITIATED CHANGES TO THE AUTHORIZATION BASIS, REV. 6,'" April 12, 2000.

Details of the proposed revision are provided in Attachment #1.

This proposed change does not apply to changes to the approved Quality Assurance Program (QAP) or the approved Radiation Protection Program (RPP).

Reason(s) for the proposed revision:

The request to allow BNFL Inc. to proceed at risk with certain changes is prompted by BNFL's experience with situations in which project work has been impacted because desirable, safe and effective standards or practices were inconsistent with those described in the current Authorization Basis. It is likely that design and construction delays will occur in the future, potentially leading to serious cost and schedule consequences as a result of idling work forces while safety documentation is being developed and while Regulatory Unit review is in progress. BNFL Inc. believes that it will be advisable, on occasion, to "proceed at risk" with certain changes that require modifications to the Authorization Basis.

This revision also makes ISMP consistent with Rev. 6 of RL/REG-97-13.

Description of the proposed implementation schedule:

BNFL Inc. intends to utilize the proceed at risk approach to demonstrate alignment with the Authorization Basis as part of its response to RU Corrective Action Notice CAN-2000-01. As noted in RU letter #00-RU-0267 that transmitted the CAN, the RU will conduct an inspection the week of April 24, 2000, to review BNFL's progress in resolving IR-99-007-01-FIN with respect to maintaining the AB current. Consequently, the following implementation schedule is proposed for this ABAR:

Regulatory Unit approval: Requested by April 24, 2000.

Change implemented within 10 working days following RU approval (May 8, 2000).

If the revision involves the deletion or modification of a standard previously identified in the approved SRD, provide:

- A. An evaluation that demonstrates the revised SRD continues to identify a set of standards that will provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards; and
- B. A certification that the revised SRD identifies a set of standards that continues to provide adequate safety, comply with all applicable laws and regulations, and conform to top-level safety standards.

Attachments:

1. Copies of the AB document(s) or appropriate excerpt showing the proposed revision(s).
2. Copy of safety evaluation.
3. If not included above, justification for the revision and demonstration that the revision is safe.

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4. Items A and B above, if applicable.

Manager, EngineeringDateRadiological, Nuclear, and Process Safety ManagerDateManager, Quality AssuranceDateChairman, Project Safety CommitteeDateRPP-WTP General ManagerDate